

Message

From: Hales, Dana [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D18193CD39504DFD923A124DDE2C6240-WALKER, DANA]
Sent: 7/16/2020 8:56:11 PM
To: Abraham, Sara Reji [saabraham@pa.gov]; Patel, Pravin [prpatel@pa.gov]; Unger, Steven [sunger@pa.gov]
CC: Mark Smith [Smith.Mark@epa.gov]; Martinsen, Jessica [Martinsen.Jessica@epa.gov]
Subject: Exelon Eddystone PA0013714

Sara, Pravin, and Steve,

Thank you for talking with us this morning about the Exelon Eddystone draft permit (PA0013714). Below is a summary of the items that EPA is asking you to address in the fact sheet and/or permit. Let's see what can be addressed before our comments are due on the draft permit next week.

1. Regarding 316(b):
 - a. Please include a statement in the fact sheet that clearly states the Department's BTA determination for impingement and entrainment for this facility.
 - b. The fact sheet references the facility's SOP for a Flow Reduction Alternative, but doesn't explain what that plan entails. Please revise the fact sheet to include some details about the plan and the proposed reductions in water withdrawals resulting from its implementation.
2. Outfall 005 was removed from the permit. The fact sheet states the following about outfall 005:
Outfall 005, previously discharging stormwater from equipment and roof drains associated with Units 1 and 2 is eliminated from this permit. All equipment and associated structures that contributed to the discharge from 005 have been removed.
It's unclear whether outfall 005 is still discharging stormwater and needs to remain in the permit (with no specific monitoring requirements), or whether the outfall has completely be eliminated and no longer exists. If the stormwater outfall remains, it should be appropriately identified in the permit.
3. The Delaware River PCB TMDL identifies 4 outfalls for this facility with WLAs. Those outfalls include 001, 005, 007, and 008. While PCB monitoring is required at outfall 001 and MP 108, the fact sheet doesn't include any explanation of why PCB monitoring is not required at the other outfalls. I realize this decision was likely made in consultation with DRBC in the past, but this justification needs to be provided in the fact sheets to document consistency with the TMDL WLAs.

Let us know if any additional conversations are needed.

Thanks,
Dana

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